

098-067-00

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION

WILLIAM BELCHIA,

Plaintiff,

vs.

CORRECTIONS CORPORATION
OF AMERICA, et al.

Defendants.

No.: 1:05-1228 T/An

MOTION AND MEMORANDUM FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT

COME NOW the Defendants, Corrections Corporation of America ("CCA"), Dr. Frederick Cole and Dana Spalding (hereinafter referred to as "Defendants"), by and through counsel of record, hereby move the Court for an extension of time to file a response to the Complaint. Defendants would state and show unto the Court as follows:

1. Plaintiff's Complaint was filed on August 11, 2005 and service obtained on November 9th and 12th..

2. That further fact investigation is necessary to file a response to the Plaintiff's Complaint on behalf of Defendants. Counsel for the Defendants needs further time to investigate the complaints and allegations of the Plaintiff against the Defendants before a responsive pleading is filed.

In support of this Motion, the Defendants would rely upon the attached consultation of

MOTION GRANTED
DATE: 25 November 2005

James D. Todd
James D. Todd
U.S. District Judge

counsel. Counsel for these Defendants would request an extension be granted up to and including December 30, 2005 to serve a responsive pleading and it is the belief of counsel for these Defendants that no prejudice will result to the Plaintiff because of this extension.

Respectfully submitted,

PENTECOST, GLENN & RUDD, PLLC

By: 

JAMES I. PENTECOST #11640
Attorneys for Defendants,
CCA, Dr Frederick Cole and
Dana Spalding
106 Stonebridge Boulevard
Jackson, Tennessee 38305
(731) 668-5995

CERTIFICATE OF SERVICE

This is to certify that I have served a copy of this pleading or paper personally or by mail upon each attorney or firm of attorneys appearing of record for each adverse party or each *pro se* party on or before the filing date thereof.

DATED: This the 23rd day of November, 2005.

PENTECOST, GLENN & RUDD, PLLC

By: 

JAMES I. PENTECOST
Attorney for Defendants



Notice of Distribution

This notice confirms a copy of the document docketed as number 10 in case 1:05-CV-01228 was distributed by fax, mail, or direct printing on December 1, 2005 to the parties listed.

William Belchia
152705
PO Box 679
Whiteville, TN 38075

Honorable James Todd
US DISTRICT COURT